

## Appendix D - Appendices

### QUESTIONS FROM COUNCILLORS FOR WRITTEN REPLY - APPENDICES

#### Appendix 1 (Question 1)

Count of Green Garden Waste			
Ward Description	GW Number of Containers	Total Customers	Total Containers
Bickley	1	1425	1425
	2	64	128
	3	5	15
	4	2	8
Bickley Total		1496	1576
Biggin Hill	1	710	710
	2	12	24
Biggin Hill Total		722	734
Bromley Common and Keston	1	1230	1230
	2	31	62
	3	6	18
	6	1	6
Bromley Common and Keston Total		1268	1316
Bromley Town	1	1043	1043
	2	27	54
	3	1	3
Bromley Town Total		1071	1100
Chelsfield and Pratts Bottom	1	1685	1685
	2	37	74
	3	2	6
Chelsfield and Pratts Bottom Total		1724	1765
Chislehurst	1	1556	1556
	2	70	140
	3	8	24
	4	3	12
Chislehurst Total		1637	1732
Clock House	1	664	664
	2	5	10
Clock House Total		669	674
Copers Cope	1	659	659
	2	38	76
	3	1	3
	4	1	4
Copers Cope Total		699	742
Cray Valley East	1	837	837
	2	9	18
Cray Valley East Total		846	855
Cray Valley West	1	1097	1097
	2	18	36
Cray Valley West Total		1115	1133

Crystal Palace	1	159	159
	2	6	12
Crystal Palace Total		165	171
Darwin	1	365	365
	2	15	30
	3	3	9
Darwin Total		383	404
Farnborough and Crofton	1	1954	1954
	2	46	92
	3	2	6
Farnborough and Crofton Total		2002	2052
Hayes and Coney Hall	1	2129	2129
	2	28	56
Hayes and Coney Hall Total		2157	2185
Kelsey and Eden Park	1	1039	1039
	2	23	46
	3	1	3
Kelsey and Eden Park Total		1063	1088
Mottingham and Chislehurst North	1	496	496
	2	8	16
	4	1	4
Mottingham and Chislehurst North Total		505	516
Orpington	1	2037	2037
	2	26	52
	4	1	4
Orpington Total		2064	2093
Penge and Cator	1	566	566
	2	11	22
	3	1	3
Penge and Cator Total		578	591
Petts Wood and Knoll	1	2307	2307
	2	62	124
Petts Wood and Knoll Total		2369	2431
Plaistow and Sundridge	1	940	940
	2	28	56
	3	1	3
Plaistow and Sundridge Total		969	999
Shortlands	1	1004	1004
	2	47	94
	3	2	6
Shortlands Total		1053	1104
West Wickham	1	1839	1839
	2	26	52
West Wickham Total		1865	1891
Grand Total		26420	27152

## **Appendix 2 (Question 2)**

Date	Street	Grade	Type	Feature
11-Jul-14	ANERLEY PARK	C	schedule	foot
04-Aug-14	ANERLEY PARK	D	schedule	foot
24-Sep-14	ANERLEY PARK	D	deepclean	mech(post-clean weekly)
26-Sep-14	ANERLEY PARK	D	schedule	foot
03-Oct-14	ANERLEY PARK	C	schedule	foot
23-Oct-14	ANERLEY PARK	C	deepclean	mech(post-clean weekly)
20-Nov-14	ANERLEY PARK	D	deepclean	mech(post-clean weekly)
06-May-16	ANERLEY PARK	C	Schedule	grade_foot
25-Oct-16	ANERLEY PARK	C	Schedule	grade_foot
06-Dec-16	ANERLEY PARK	C	Schedule	grade_foot
20-Dec-16	ANERLEY PARK	C-	Grade_Failure	grade_foot
24-Jan-17	ANERLEY PARK	C-	Grade_Failure	grade_foot
31-Jan-17	ANERLEY PARK	D	Grade_Failure	grade_foot
07-Feb-17	ANERLEY PARK	C	Grade_Failure	grade_foot
23-Oct-14	ANERLEY PARK ROAD	C	deepclean	mech(post-clean weekly)
20-Nov-14	ANERLEY PARK ROAD	D	deepclean	mech(post-clean weekly)
24-Sep-14	ANERLEY ROAD	C	schedule	foot
07-Oct-14	ANERLEY ROAD	C	schedule	foot
07-Feb-17	ANERLEY ROAD	D	Schedule	grade_foot
01-Mar-17	ANERLEY ROAD	C	Grade_Failure	grade_foot
19-Apr-17	ANERLEY ROAD	C-	Grade_Failure	grade_foot
03-Oct-14	ANERLEY VALE	C	schedule	foot
03-Oct-14	BEVERLEY ROAD	D	schedule	foot
24-Oct-14	BEVERLEY ROAD	C	schedule	foot
28-Oct-14	BEVERLEY ROAD	C	schedule	mech
28-Oct-14	BEVERLEY ROAD	C	schedule	foot
11-Nov-14	BEVERLEY ROAD	C	schedule	foot
27-Jan-17	BEVERLEY ROAD	C	Schedule	grade_foot
30-Jun-14	BORDER CRESCENT	C	schedule	foot
27-Aug-14	BORDER CRESCENT	D	deepclean	foot(post-clean weekly)
20-Dec-16	BORDER CRESCENT	C	Schedule	grade_foot
20-Jan-17	BORDER CRESCENT	D	Schedule	grade_foot
24-Jan-17	BORDER CRESCENT	D	Grade_Failure	grade_foot
02-May-14	BRUNSWICK PLACE	C	schedule	foot
05-Aug-14	BRUNSWICK PLACE	C	schedule	foot
08-Aug-14	BRUNSWICK PLACE	C	schedule	foot
03-Oct-14	BRUNSWICK PLACE	C	schedule	foot
07-Nov-14	BRUNSWICK PLACE	C	schedule	foot
11-Nov-14	BRUNSWICK PLACE	C	schedule	foot
13-Dec-16	BRUNSWICK PLACE	C	Schedule	grade_foot

21-Oct-16	CASTLEDINE ROAD	C	Schedule	grade_foot
24-Jan-17	CASTLEDINE ROAD	C	Schedule	grade_foot
04-Jun-14	CROYDON ROAD	C	schedule	foot
16-Jun-14	CROYDON ROAD	C	schedule	foot
16-Jun-14	CROYDON ROAD	C	schedule	mech
27-Jun-14	CROYDON ROAD	C	schedule	foot
08-Jul-14	CROYDON ROAD	C	schedule	foot
14-Jul-14	CROYDON ROAD	C	schedule	foot
17-Jul-14	CROYDON ROAD	C	schedule	foot
30-Jul-14	CROYDON ROAD	C	schedule	foot
31-Jul-14	CROYDON ROAD	C	schedule	foot
01-Aug-14	CROYDON ROAD	C	schedule	foot
04-Aug-14	CROYDON ROAD	C	schedule	foot
04-Aug-14	CROYDON ROAD	C	schedule	foot
08-Aug-14	CROYDON ROAD	C	schedule	foot
19-Aug-14	CROYDON ROAD	C	schedule	foot
02-Sep-14	CROYDON ROAD	C	schedule	foot
05-Sep-14	CROYDON ROAD	C	schedule	foot
08-Sep-14	CROYDON ROAD	C	schedule	foot
29-Sep-14	CROYDON ROAD	C	schedule	foot
30-Sep-14	CROYDON ROAD	C	schedule	foot
30-Sep-14	CROYDON ROAD	C	schedule	foot
03-Oct-14	CROYDON ROAD	C	schedule	foot
06-Oct-14	CROYDON ROAD	C	schedule	foot
08-Oct-14	CROYDON ROAD	C	schedule	foot
08-Oct-14	CROYDON ROAD	C	schedule	foot
08-Oct-14	CROYDON ROAD	C	schedule	foot
10-Oct-14	CROYDON ROAD	C	schedule	foot
24-Oct-14	CROYDON ROAD	C	schedule	foot
28-Oct-14	CROYDON ROAD	C	schedule	mech
28-Oct-14	CROYDON ROAD	C	schedule	foot
07-Nov-14	CROYDON ROAD	C	schedule	foot
11-Nov-14	CROYDON ROAD	C	schedule	mech
11-Nov-14	CROYDON ROAD	C	schedule	foot
12-Feb-16	CROYDON ROAD	C	Schedule	grade_foot
22-Apr-16	CROYDON ROAD	D	Grade_Failure	grade_foot
18-Oct-16	CROYDON ROAD	C	Schedule	grade_foot
28-Oct-16	CROYDON ROAD	C	Schedule	grade_mech
06-Dec-16	CROYDON ROAD	C	Schedule	grade_foot
13-Dec-16	CROYDON ROAD	C	Grade_Failure	grade_foot
15-Dec-16	CROYDON ROAD	C-	Schedule	grade_foot
20-Dec-16	CROYDON ROAD	C	Grade_Failure	grade_foot
17-Jan-17	CROYDON ROAD	C	Grade_Failure	grade_foot
27-Jan-17	CROYDON ROAD	C	Schedule	grade_foot
31-Jan-17	CROYDON ROAD	C	Grade_Failure	grade_foot

21-Feb-17	CROYDON ROAD	C-	Schedule	grade_foot
14-Mar-17	CROYDON ROAD	C	Grade_Failure	grade_foot
28-Mar-17	CROYDON ROAD	C-	Grade_Failure	grade_foot
09-May-17	CROYDON ROAD	D	Grade_Failure	grade_foot
15-Jul-14	CRYSTAL PALACE PARADE	C	schedule	foot
05-Aug-14	CRYSTAL PALACE PARADE	C	schedule	foot
04-Sep-14	CRYSTAL PALACE PARADE	C	schedule	foot
24-Sep-14	CRYSTAL PALACE PARADE	C	schedule	foot
28-Nov-14	CRYSTAL PALACE PARADE	C	schedule	foot
31-Jan-17	CRYSTAL PALACE PARADE	D	Schedule	grade_foot
09-May-17	CRYSTAL PALACE PARADE	C	Grade_Failure	grade_foot
05-Aug-14	CRYSTAL PALACE PARK ROAD	C	schedule	foot
08-Aug-14	CRYSTAL PALACE PARK ROAD	C	schedule	foot
28-Aug-14	CRYSTAL PALACE PARK ROAD	C	schedule	foot
01-Sep-14	CRYSTAL PALACE PARK ROAD	D	schedule	foot
02-Sep-14	CRYSTAL PALACE PARK ROAD	D	weekend	foot(post-clean weekend)
26-Sep-14	CRYSTAL PALACE PARK ROAD	C	schedule	foot
03-Oct-14	CRYSTAL PALACE PARK ROAD	C	schedule	foot
20-Jan-17	CRYSTAL PALACE PARK ROAD	C	Schedule	grade_foot
28-Mar-17	CRYSTAL PALACE PARK ROAD	C	Schedule	grade_foot
24-Jan-17	CRYSTAL PALACE STATION ROAD	C	Schedule	grade_foot
01-Aug-14	DERWENT ROAD	C	schedule	foot
04-Aug-14	DERWENT ROAD	C	schedule	mech
04-Aug-14	DERWENT ROAD	C	schedule	foot
08-Aug-14	DERWENT ROAD	C	schedule	foot
19-Aug-14	DERWENT ROAD	D	schedule	foot
01-Sep-14	DERWENT ROAD	C	schedule	mech
01-Sep-14	DERWENT ROAD	C	schedule	foot
02-Sep-14	DERWENT ROAD	C	weekend	mech(post-clean weekend)
24-Oct-14	DERWENT ROAD	C	schedule	foot
28-Oct-14	DERWENT ROAD	C	schedule	mech
25-Nov-14	DERWENT ROAD	C	schedule	mech
17-Jan-17	DERWENT ROAD	C	Schedule	grade_mech
27-Jan-17	DERWENT ROAD	C	Schedule	grade_foot
14-Feb-17	DERWENT ROAD	C	Schedule	grade_foot
14-Feb-17	DERWENT ROAD	C	Grade_Failure	grade_mech
24-Mar-17	DERWENT ROAD	C	Grade_Failure	grade_foot
07-Oct-14	GEORGE GROVES ROAD	C	schedule	foot
05-Aug-14	HADLOW PLACE	C	schedule	foot
08-Aug-14	HADLOW PLACE	C	schedule	foot
03-Oct-14	HADLOW PLACE	C	schedule	foot
07-Nov-14	HADLOW PLACE	C	schedule	foot
25-Nov-14	HADLOW PLACE	C	schedule	foot
29-Sep-14	HAMLET ROAD	C	schedule	foot

11-Nov-14	HAMLET ROAD	C	schedule	mech
11-Nov-14	HAMLET ROAD	C	schedule	foot
24-Jan-17	HAMLET ROAD	D	Schedule	grade
22-Jan-16	HAYSLEIGH GARDENS	C	Schedule	grade_foot
22-Apr-16	HAYSLEIGH GARDENS	C	Grade_Failure	grade_foot
27-Jan-17	HAYSLEIGH GARDENS	C-	Schedule	grade_foot
09-May-17	HAYSLEIGH GARDENS	C	Schedule	grade_foot
28-Aug-14	LAWRIE PARK ROAD	C	schedule	foot
24-Jan-17	LEDINGTON ROAD	D	Schedule	grade_foot
24-Jan-17	LEDINGTON ROAD	D	Schedule	grade
05-Aug-14	LULLINGTON ROAD	C	schedule	foot
02-May-14	MABERLEY ROAD	C	schedule	foot
20-May-14	MABERLEY ROAD	D	schedule	foot
29-Sep-14	MABERLEY ROAD	C	schedule	mech
13-Dec-16	MABERLEY ROAD	C	Schedule	grade_foot
24-Jan-17	PALACE ROAD	C	Schedule	grade_foot
24-Jan-17	PLEYDELL AVENUE	C	Schedule	grade
23-Apr-14	RIDSDALE ROAD	C	schedule	foot
24-Apr-14	RIDSDALE ROAD	C	schedule	foot
28-Apr-14	RIDSDALE ROAD	C	schedule	foot
25-Jun-14	RIDSDALE ROAD	C	schedule	foot
04-Aug-14	RIDSDALE ROAD	C	schedule	mech
04-Aug-14	RIDSDALE ROAD	D	schedule	foot
20-Oct-14	RIDSDALE ROAD	C	schedule	foot
21-Oct-14	RIDSDALE ROAD	C	schedule	foot
13-Jul-16	RIDSDALE ROAD	C-	Schedule	grade_foot
22-Jul-16	RIDSDALE ROAD	C	Grade_Failure	grade_foot
13-Dec-16	RIDSDALE ROAD	C	Schedule	grade_foot
01-Mar-17	RIDSDALE ROAD	C	Schedule	grade_foot
19-Apr-17	RIDSDALE ROAD	C-	Grade_Failure	grade_foot
28-Oct-14	SELBY ROAD	C	schedule	mech
25-Nov-14	SELBY ROAD	C	schedule	mech
18-Oct-16	SELBY ROAD	C	Schedule	grade_foot
01-Nov-16	SELBY ROAD	C	Grade_Failure	grade_foot
15-Nov-16	SELBY ROAD	D	Grade_Failure	grade_foot
06-Dec-16	SELBY ROAD	D	Grade_Failure	grade_foot
20-Dec-16	SELBY ROAD	C-	Grade_Failure	grade_foot
27-Jan-17	SELBY ROAD	C	Schedule	grade_foot
14-Feb-17	SELBY ROAD	C	Schedule	grade_mech
14-Feb-17	SELBY ROAD	C	Grade_Failure	grade_foot
24-Mar-17	SELBY ROAD	D	Grade_Failure	grade_foot
21-Apr-17	SELBY ROAD	D	Grade_Failure	grade_foot
28-Oct-14	SEYMOUR VILLAS	C	deepclean	mech(post-clean weekly)
28-Oct-14	SEYMOUR VILLAS	C	deepclean	foot(post-clean weekly)

18-Nov-16	SEYMOUR VILLAS	C	Schedule	grade_foot
28-Aug-14	SYDENHAM AVENUE	C	deepclean	mech(post-clean weekly)
28-Aug-14	SYDENHAM AVENUE	C	deepclean	foot(post-clean weekly)
24-Sep-14	THICKET ROAD	D	deepclean	mech(post-clean weekly)
26-Sep-14	THICKET ROAD	C	schedule	foot
23-Oct-14	THICKET ROAD	C	deepclean	mech(post-clean weekly)
20-Nov-14	THICKET ROAD	C	deepclean	mech(post-clean weekly)
19-Apr-16	THICKET ROAD	C	Schedule	grade_foot
15-Jul-16	THICKET ROAD	C	Schedule	grade_foot
21-Oct-16	THICKET ROAD	C	Grade_Failure	grade_foot
06-Dec-16	THICKET ROAD	C	Schedule	grade_foot
20-Dec-16	THICKET ROAD	D	Grade_Failure	grade_foot
31-Jan-17	THICKET ROAD	C	Grade_Failure	grade_foot
14-Mar-17	THICKET ROAD	C	Grade_Failure	grade_foot
12-Dec-16	TOWER CLOSE	C	Schedule	grade_mech
23-May-14	TRENHOLME CLOSE	C	schedule	foot
11-Jul-14	TRENHOLME CLOSE	C	schedule	foot
03-Oct-14	TRENHOLME CLOSE	C	schedule	foot
03-Oct-14	TRENHOLME ROAD	C	schedule	foot
23-May-14	TRENHOLME TERRACE	C	schedule	foot
11-Nov-14	VERSAILLES ROAD	C	schedule	foot
19-Nov-14	VERSAILLES ROAD	C	deepclean	mech(post-clean weekly)
28-Oct-14	WADHURST CLOSE	C	schedule	mech
25-Nov-14	WADHURST CLOSE	C	schedule	mech
27-Jan-17	WADHURST CLOSE	C	Schedule	grade_foot
03-Oct-14	WALDEGRAVE ROAD	C	schedule	foot
07-Nov-14	WALDEGRAVE ROAD	C	deepclean	foot(pre-clean weekly)
11-Nov-14	WALDEGRAVE ROAD	C	schedule	foot
25-Nov-14	WALDEGRAVE ROAD	C	schedule	foot
13-Dec-16	WALDEGRAVE ROAD	C	Schedule	grade_foot
30-May-14	WEIGHTON ROAD	C	schedule	foot
10-Jun-14	WEIGHTON ROAD	C	schedule	foot
13-Jun-14	WEIGHTON ROAD	C	schedule	foot
08-Aug-14	WEIGHTON ROAD	C	schedule	foot
24-Oct-14	WEIGHTON ROAD	C	schedule	foot
28-Oct-14	WEIGHTON ROAD	C	schedule	foot
07-Nov-14	WEIGHTON ROAD	C	schedule	foot
17-Jan-17	WEIGHTON ROAD	C	Schedule	grade_foot
27-Jan-17	WEIGHTON ROAD	C	Schedule	grade_foot
14-Feb-17	WEIGHTON ROAD	C	Grade_Failure	grade_foot
24-Mar-17	WEIGHTON ROAD	C	Grade_Failure	grade_foot
31-Jan-17	WESTWOOD HILL	D	Schedule	grade_foot
01-Oct-14	WILLIAM BOOTH ROAD	C	schedule	foot

07-Oct-14	WILLIAM BOOTH ROAD	C	schedule	foot
05-Nov-14	WILLIAM BOOTH ROAD	C	schedule	foot
21-Dec-16	WILLIAM BOOTH ROAD	C	Schedule	grade_foot
18-Jan-17	WILLIAM BOOTH ROAD	C	Grade_Failure	grade_foot
19-Apr-17	WILLIAM BOOTH ROAD	C-	Grade_Failure	grade_foot



### Appendix 3 (Question 7)

Ward	1 December 2017			3 May 2018		
	Polling Station	Postal Voters	Total Electorate	Polling Station	Postal Voters	Total Electorate
Bickley	9508	2170	11678	9482	2196	11678
Biggin Hill	6891	984	7875	6839	1000	7839
Bromley Common & Keston	10588	2106	12694	10598	2084	12682
Bromley Town	11216	2020	13236	11234	2041	13275
Chelsfield & Pratts Bottom	9534	1715	11249	9396	1746	11142
Chislehurst	9648	2386	12034	9627	2384	12011
Clock House	10315	1583	11898	10246	1634	11880
Copers Cope	10250	2095	12345	10391	2160	12551
Cray Valley East	9555	1901	11456	9570	1887	11457
Cray Valley West	10542	1634	12176	10490	1608	12098
Crystal Palace	7905	1100	9005	7978	1104	9082
Darwin	3472	673	4145	3428	695	4123
Farnborough & Crofton	9687	2036	11723	9589	2059	11648
Hayes & Coney Hall	10752	1917	12669	10671	1933	12604
Kelsey and Eden Park	10378	2029	12407	10301	2033	12334
Mottingham & Chislehurst North	6413	870	7283	6442	864	7306
Orpington	10317	1871	12188	10203	1907	12110
Penge and Cator	10945	1459	12404	10982	1490	12472
Petts Wood & Knoll	9027	1714	10741	8905	1741	10646
Plaistow & Sundridge	10071	1532	11603	10065	1572	11637
Shortlands	6461	1253	7714	6449	1249	7698
West Wickham	10197	1869	12066	10068	1909	11977
TOTAL	203672	36917	240589	202954	37296	240250

## **Appendix 4 (Question 8)**

### **Introduction**

This page seeks information about respondents and the capacity in which they are responding to the consultation

**1. What is your name? Kevin Grant**

**2. What is your email address?**

[kevin.grant@bromley.gov.uk](mailto:kevin.grant@bromley.gov.uk)

**3. Are you responding as an individual or on behalf of an organisation?**

Organisation

**4. If you are responding on behalf of an organisation, what is your organisation?**

London Borough Bromley

**5. Which of the following best describes the capacity in which you are responding to this consultation?**

Education

**6. Which local authority area are you based in?**

Bromley

**7. Would you like us to keep your responses confidential?**

No

*Information provided in response to consultations, including personal information, may be subject to publication or disclosure under the Freedom of Information Act 2000, the Data Protection Act 1998 or the Environmental Information Regulations 2004.*

*If you want all, or any part, of a response to be treated as confidential, please explain why you consider it to be confidential.*

*If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.*

*The Department for Education will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.*

### **Information about home educated children**

This section is about current and possible future arrangements for registration of children who are being educated at home

**8. How effective are the current voluntary registration schemes run by some local authorities? What would be the advantages and disadvantages of mandatory**

## **registration of children educated at home, with duties on both local authorities and parents in this regard?**

### **Context**

At present, 292 pupils are registered as Electively Home Educated (EHE) in Bromley. We know from anecdotal evidence and web based feedback that our Authority is perceived as non-threatening within the community of Electively Home Educating parents, but like other authorities, most (92%) of those children registered as EHE are those who have come to our attention when they stopped attending school. In other words, the number of unregistered children being home educated is not known and cannot be accurately estimated.

The effectiveness of the current arrangements is limited to the services and support provided to families who register their Elective Home Education status with us. We do not know how many children are being Electively Home Educated in Bromley, as they are unregistered and by extension, we cannot quantify their needs or ensure they receive their entitlement to services.

We believe that compulsory registration brings with it the following advantages and disadvantages:

### **Registration Advantages**

- It enables Authorities to identify the children who are EHE and helps to reduce the number of children not receiving their educational entitlement.
- The Authority can send information and advice direct to the families.
- The Authority can offer support when requested (at present, families can only request information about provision only if they are known as being educated at home).
- The Authority can share data with the NHS to notify families of immunisation programmes usually only delivered via schools, and can prioritise any vulnerable children within the limited school nursing resources available.
- Registration allows Children's Social Care to know if the child is educated in school or registered as EHE when they have concerns and helps to meet s 437(1)

Education Act 1996 to intervene & s 436A to enable Authorities to identify children not registered at school or receiving suitable education.

### **Registration Disadvantages – Current and Future Systems**

- Information can become obsolete– there is no current requirement for families to notify the Authority if the child moves home within or outside the area or between parents/carers etc.
- Administrative burden on the Authority will increase; therefore this will need to be resourced.
- There is a risk that some families may move further 'under the radar' to avoid what they perceive as a threat to their freedom to Home educate without external interference.

## **9. What information is needed for registration purposes, and what information is actually gathered by local authorities? Would it help the efficacy of these schemes, and the sharing of information between authorities, if there were a nationally agreed dataset or if data could be shared by national agencies, such as DWP or the NHS?**

The Authority current collects the following information: Name, DOB, address related information, parents/carer names, parents/carer phone numbers, previous school, reason given for EHE, CSC involvement and SEND/EHCP status.

In the future, our preferred information would be the same, but an agreed inter-Authority minimum would be beneficial.

**10. Does experience of flexi-schooling and similar arrangements suggest that it would be better if the scope of registration schemes included any children who do not attend a state-funded or registered independent school full-time? If so, do you think that local authorities should be able to confirm with both state-funded and independent schools whether a named child is attending that school full-time?**

Flexi-schooling reduces clarity in the context of EHE. Children are either on roll at a school or not (EHE). Flexi-schooling confuses these issues and introduces the possibility of questions relating to responsibility for outcomes, safeguarding, etc. between education providers. Independent schools – the Authority believes that where children are attending independent schools whether in full time or part time provision the school has responsibility for the outcomes whilst parent still has a duty to ensure the child has suitable education – neither would be considered EHE.

Recording of children on a school roll but on reduced hours should be undertaken by the LA but responsibility for outcomes would rest with the school.

Further education colleges that provide courses for pre-16 children may be part-time or less frequently full-time. If the parent has opted to supplement their delivery of education at home/otherwise with a college placement paid for by DfE via the college – these should be considered EHE with an ‘outsourced’ provision.

If flexi schooling is going to be actively encouraged by the DfE then it would be helpful to have clearer guidance, which should consider:

- Safeguarding the child as of paramount importance; should schools be accountable for outcomes given that they are not responsible for a proportion of the teaching?
- The appropriateness of the education proposed by the parent away from the school.
- Clarity around pupil funding.
- The effect on school resources.
- The effect on school discipline and the morale and motivation of other children on roll at the school, where adhoc attendance may lead to disruptive behaviour.
- Strategies and guidance to be set in place for class teachers who will be required to differentiate and make time for a pupil who will be away from class regularly/intermittently.
- Clear agreement between the parent and school with regard to the times the Child or young person will be in school
- Schools should have a reporting mechanism for registration that does not penalise them for the attendance of these CYP.

**11. Would the sanction of issuing a school attendance order for parental non-compliance with registration be effective, or is there another sanction which would be more useful?**

The application of using a SAO for parental non-compliance appears suitable. However, the prime issue here relates to children who are not recorded with local authorities as they have never attended school. It may be considered whether a financial penalty related to family income levels could be a further sanction in exceptional cases, possible for those taken before a court.

**12. What steps might help reduce the incidence of schools reportedly pressuring parents to remove children to educate them at home?**

It should be recommended practice that a child or young person who leaves a school to be Electively Home Educated should remain on the school roll until a LA officer has visited the home and confirmed that the parent is able and/or willing to home educate their child or young person. A school should be required to provide an evidence trail to show that every effort was made to engage with the parent/child. Parents intending to EHE should develop an initial plan on how they intend to deliver suitable education, which should be attached to the letter of intent.

Where a school fails in these instances, the school should be required to return a proportion of funding for the whole of the academic year and this sum should be passed to the LA and ring-fenced for the support of genuine and capable home educators.

The outcome data of any child being EHE in years 10/11 should be kept by the school and reflected in their overall results.

Where Elective Home Education is inappropriately promoted as an option to a parent by a school, the school must be required to re-admit the child/young person immediately and without further disruption to the education of that child/young person. Identified instances should be recorded by the Authority and reported to Ofsted and the Schools Adjudicator in the LA annual report.

**13. Is there an argument for some provision which allows a child to return to the same school within a specified interval if suitable home education does not prove possible?**

Yes, this should be a requirement in the revised guidance. This will further encourage schools towards responsible action around EHE

**Monitoring educational provision made at home or for home-educated children**

The questions in this section are about ways in which oversight of children who are being home educated would be best arranged so that it helps to ensure the education provided is suitable, but also so that the oversight is proportionate to need.

**14. How effective is local authority monitoring of provision made for children educated at home? Which current approaches by local authorities represent best practice?**

The Authority systematically reviews Elective Home Education provision via contact with parents on a regular basis, offering 1-2-1 meetings at their home address (around 85% of family groups in Bromley currently accept the home visit route) or elsewhere by an EHE Officer, as well as the option to produce information by other means such as written summaries.

A request for information for an education plan is made as soon as the child is deregistered from school.

Where the child has an Education Health and Care Plan, the EHE Officer calls a review of the Plan when EHE decision is made by parent.

The best approach is for Authorities to view Elective Home Education support as intrinsically linked to Early Help and to have EHE support staff involvement. An opportunity to be able to speak with the child is essential as any assessment made without seeing the child is dubious.

**15. If monitoring of suitability is not always effective, what changes should be made in the powers and duties of local authorities in this regard, and how could they best ensure that monitoring of suitability is proportionate?**

A framework of expectations that demonstrate suitability of education is needed so that all Authorities are working to the same criteria. It is challenging to measure suitability and outcomes when there are no benchmarking requirements or assessment of progress, leaving excessive flexibility between Local Authorities and individual staff.

Lord Soley's Bill makes a common sense suggestion:

'The expectation that Elective Home Education must include provision of supervised instruction in reading, writing and numeracy, which takes into account the child's age, ability, aptitude and any special educational needs and disabilities'.

It would be useful for Ofsted and the DFE to set out a best practice guide, defining how suitable Elective Home Education should be measured. It is recognised that many home educators may introduce unconventional ways for their children to learn naturally, this is understood and welcome, but there must be evidence made available of learning or it is impossible to distinguish this with families in chaotic situations who are unable to provide evidence of learning.

**16. Should there be specific duties on parents to comply with local authorities carrying out monitoring if such LA powers and duties were created, and what sanctions should attach to non-compliance?**

Monitoring should be a statutory duty of Authorities and parents should be legally required to cooperate. Without a duty on parents to notify the Authority of their child's education provision and to comply with demonstrating the suitability of current systems means that parents can avoid being monitored and avoid having to provide suitable education. All Authorities need to be clear and unambiguous about this in order to establish clear expectations and common quality standards.

Home educators should be prepared to show examples of their children's learning and enable those with a duty to monitor, to see the child engaged in learning. Where parents refuse to allow officers into the home environment and prefer a neutral location like a local library to be the meeting point, monitoring officers must be given the opportunity to discuss the education provision with the child. Where children and/or families put barriers in the way of officers seeking to identify education, then the School Attendance Order should be progressed without delay and only ceased if a visit is forthcoming and confirmation of suitable education is established.

If families refuse to allow access to the child or fail to meet with the LA at reasonable prearranged appointments (in or out of the home) the child should be registered as a Child Missing Education and a School Attendance Order to be initiated. All schools & academies must be legally required to cooperate with that order. A school/academy should be named through the In Year Fair Access Process, to avoid schools with places receiving a disproportionate number of children/young people who have been out of education for some time. Unless the parent's preferred school is willing to admit the child/young person, the original school should be required to readmit that child/young person back onto their school role.

**17. Is it necessary to see the child and/or the education setting (whether that is the home or some other place), in order to assess fully the suitability of education, and if so, what level of interaction or observation is required to make this useful in assessing suitability?**

Yes, the majority of EHE families in Bromley agree to visits in their own homes; they are keen to show how well the child is doing. Visits do not need to be in the home and could be at a community facility or the LA office.

Home visits contribute to an effective assessment of whether a suitable education is being provided. Without the evidence of a home visit, it is possible for evidence of a suitable education to be provided to the authority through downloaded written plans or 'evidence' that bear no relation to the reality of what is being offered/delivered to the child. The current situation is that home visits provide safeguarding assurance to the Local Authority as the Authority has no powers to inspect the effect of the education on a child. The association of Authority visits with safeguarding interventions may act as a deterrent for some parents.

**18. What can be done to better ensure that the child's own views on being educated at home, and on the suitability of the education provided, are known to the local authority?**

One of the greatest challenges with Electively Home Educated children is that they have considerably less natural contact with professionals with whom they can share their views and feelings to, compared to their peers. It is possible to commission independent advocates just as these are commissioned for vulnerable children but such a resource that by necessity needs to be borne centrally. Web based feedback can also be used at an individual level. All attempts to see a child who is perceived to be vulnerable by themselves should be made. In Bromley we have begun a project on developing student voice amongst those children who are Electively Home Educated as well as making sure that they have representatives on the Youth Council alongside representatives from local schools.

**19. What are the advantages and disadvantages of using settings which are not registered independent or state schools, to supplement home education? How can authorities reliably obtain information on the education provided to individual children whose education 'otherwise than at school' includes attendance at such settings as well as, or instead of, education at home?**

The Authority operates with great caution around the use of unregistered providers because of the lack of regulation and accountability required. This creates issues significant of the variability of quality of provision and safeguarding standards in the learning provision. Once a parent has elected to educate at home, the onus should remain on the parent to provide evidence for that the education provided by supplementary sources is suitable.

**20. What are the advantages and disadvantages of using private tutors to supplement home education? How can authorities best obtain information on the education provided to individual children whose education at home includes private tuition, or whom attend tuition away from home?**

Many parents pay for private tutoring to supplement their child's learning at school. In these circumstances our expectation is that the private tutoring enhances what is already provided (and measured for quality).

In an Elective Home Education situation where private tuition is provided, neither provider is registered or regulated. It is difficult to be confident in all cases that one is not used to replace or compensate for the other. Quality assessment of unregistered, non-specific 'tutors' or other non-school part time settings is not the LA's responsibility and would also not be practical – it is the parent's responsibility to assess appropriateness. The DfE could take steps to regulate private tutoring or offer guidelines. A national register of local private tutors registered with the LA or an external body.

**21. Are there other matters which stakeholders would wish to see taken into account in this area? If so please insert comments below.**

- DBS clearance of home tutors should be regularly reviewed.
- Qualifications for teaching CORE subjects centrally recorded.
- A process to prevent school attending families from declaring EHE to take term time holidays.

**Support for Home-Educating families**

The questions in this section are about ways in which families who educate children at home could be best supported to do so.

**22. What might be done to improve access to public examinations for children educated at home?**

- All Authority schools should be required to offer to accept private examination entries with in an agreed limit of a percentage of their number on roll at KS4. These should not be counted on the schools results.
- The DfE could provide guidance on reasonable maximum costs to take into account administration, invigilators, SEN, and profit so that parents pay equitable and affordable costs.
- Parents would be required to buy an examination place and pay in advance.

A list of examination centres and exam boards/subjects covered should be published by all Authorities which could be expanded if all future funding agreements for schools required them to host external EHE candidates.

**23. What good practice is there currently in local authority arrangements for supporting home-educating families? Should there be a duty on local authorities to provide advice and support and if so how should such a duty be framed?**

The LA could provide support such as guidance visits, website with guidance on EHE responsibilities, links to the EHE community and signposts to other LA support. LA's will have to provide resources to register, monitor and to improve education at home where it is inadequate or to enforce an SAO.

Parents who EHE have taken full responsibility for their child's education so they cannot expect the same level of support as provided for children at school. Some LA's do pay for public examinations if known for one year to the LA.

Currently the Authority provides the following:

- Registers all EHE young people (where known) on a database.
- Provides an introductory letter and information pack with the offer of multiple visits where appropriate, together with a written report that is shared with parents.
- Undertakes an initial visit to explain what is available to parents and what they are accountable for (some families enter into Elective Home Education without fully understanding what is required) and provide sign posting to other services.
- Website advice for parents together with bespoke telephone or email advice and guidance service for schools and parents.
- Maintains good links with EHE parent groups responding to local need.



- A forum for student voice is being developed as is representation on the Youth Council.

### **Other matters**

This section asks questions about some specific issues connected with home education. It also allows for general comments to be made on current arrangements for home education, and possible changes.

#### **24. Should there be a financial consequence for schools if a parent withdraws a child from the school roll to educate at home?**

Yes - EHE is a legal option to school attendance so the resulting financial savings should be directed to LA's to assist those families where requested.

However, where a school is proven to be persuading parents to remove the child from the register, the child is already likely to be costing the school in some way, perhaps not directly financial. Therefore, a financial penalty may be viewed as a small price to pay compared to the existing problem, or even seen as a solution to end an ongoing drain on staff resource. Then again, some schools or districts have higher numbers of children who are more likely to be removed for EHE for religious or cultural reasons such as GRT or religious groups. These schools could be unfairly impacted financially compared to schools in other areas.

#### **25. Should there be any changes to the provision in Regulation 8(2) of the Education (Pupil Registration) (England) Regulations 2006 requiring local authority consent to the removal of a child's name from the roll of a maintained special school if placed there under arrangements made by the local authority?**

It is important that LAs retain the right to consent to the removal of a child from a special school role for the following reasons:

- Where a child/young person with SEND is made an EHC Plan, the Local Authority remains legally responsible for ensuring that the provision in that EHC plan is made, until such time as the EHC Plan is no-longer maintained, which is when the child/young person no longer requires special educational provision commensurate with an EHC plan.
- LA's retain a duty to safeguard children and young people, especially those who are vulnerable. As such, it is for the LA to determine if the family is able to make the special educational provision detailed in an EHC Plan. Parents, though well-intentioned, may underestimate the expertise needed to meet the educational entitlement of a child/young person with SEND. It is a LA's duty to determine suitable education arrangements for a child/young person with an EHC Plan, not a parents
- Where cases progress to the First Tier Tribunal and the child/young person has been removed from the role of a special school, the LA's position may be prejudiced if it

cannot demonstrate that it can make suitable education, including the provision of a suitable education placement. When removing a child/young person from roll, there is inevitably another child/young person waiting to take-up that place. Parents may 'game' the system and may, after removing a child from roll which becomes filled by another child, later argue that because the LA cannot make a suitable state-funded education placement, it must then make provision and placement in the independent / non- maintained sector, at substantially higher costs.

- Where s.444 of the Education Act 1996 is cited, this may well be, but for LAs having to rely on prosecuting parents for an offence further reduces the trust and damages the potential for an alongside and collaborative relationship between the LA and the family.

There is a case for extending this to all children who have an EHCP.

**26. Are there any other comments you wish to make relating to the effectiveness of current arrangements for elective home education and potential changes?**

Current arrangements are inevitably ineffective either to ensure education or around safeguarding as long as LA's do not know which children within its boundary are being home educated.

Many EHE lobby groups are well intentioned and largely educate their children well. These groups however, DO NOT represent vulnerable parents/families/children whose motives to EHE may be anything but educational. The most vulnerable are unable to articulate their concerns even if they wished to do so. It is these children who we should prioritise and be concerned about. The current 'light touch'/lack of clarity may suit some EHE parents but not the most vulnerable in our society.

**27. What data are currently available on the numbers of children being educated at home in your local authority area?**

When a child is leaving a school to be EHE, or become aware of one, they are added to our recording database. Parents must write to school and schools must inform LA. Generally this system works well.

However, as families do not have to register if child has never attended school then there will be 'many' unknown EHE families and it is impossible to suggest a number or percentage re this total. Also, if these families move then we may not know. There needs to be a duty on EHE parents to inform the LA of a change of address. If they move out of county then LA has duty to inform next LA or report as CME.

Currently (June 2018) Bromley has around 290 recorded EHE children, plus an unknown number we are not aware of.

**28. Do you have any comments on any of the contents of the call for evidence document in relation to equality issues?**

Guidance around GRT needs aligning and is at present contradictory. Some areas of local authorities have more EHE than other, which may relate to religious, ethnicity or other issues. EHE families often claim they remove their child due to inadequate SEN support at school or because relationships between schools and families has broken.

Overall this call for evidence is welcomed particularly in light of potential vulnerability of some children in this cohort. Parent's right to EHE is enshrined in law but appropriate safeguards must be in place to care for all children equally as a necessary balance to this right.

**Draft revised DfE guidance on home education: for local authorities**

This section invites comments on different sections of the draft revised guidance document about the current framework for home education, which DfE proposes to publish for local authority use. Copies of the draft document can be downloaded from the Overview page.

**29. Comments on Section 1: What is elective home education?**

This needs clarity on EHE & Flexi-schooling. Flexi schooling is an agreement between parents and schools and therefore not an LA responsibility. Either a child is EHE or they are not.

Clarity around EHE attending college 14-16 courses would be welcomed - i.e. colleges must submit names to the local LA.

### **30. Comments on Section 2: Reasons for elective home education - why do parents choose to provide it?**

Parents are not currently obliged to provide a reason and even if they do it may not be the 'real reason'. Those wanting to avoid a penalty fine for taking a holiday, parents who have fallen out with staff /other pupil's parents or may abuse their child are unlikely to give this as the reason.

The best way to determine why will be an in depth conversation with parents and child although are the reasons as important as the provision? A 20 day cooling off period would be good to explore.

Families who suddenly remove their yr10 or 11 child to EHE for ideological views are hard to accept without exploring matters further. This would also help to identify situations where schools have pushed pupils out.

### **31. Comments on Section 3: The starting point for local authorities**

Including a statement which advises that the LA does not currently have any specific duties or powers relating to home education per se, is very disappointing and serves to add weight to arguments made by families not wishing to engage. The LA has a duty to ensure children are in receipt of education and this is impossible unless families engage.

### **32. Comments on Section 4: How do local authorities know that a child is being educated at home?**

1. Schools have duty to inform the LA.
2. Other professionals alerting the LA - confirmed and cross referenced with school.
3. Sometimes Housing Associations, GP practices, police and hospitals ask newly registered patients about 'what school'? If EHE claimed, they might advise LA but not certain.
4. Disgruntled or estranged parent or grandparent may advise the LA.
5. As mentioned in Q8 many parents volunteer to inform the LA and these are added to the data base.
6. Other LA's inform us when a pupil moves into the area however this is inconsistent as many parents do not inform the LA of a change of address.

### **33. Comments on Section 5: Local authorities' responsibilities for children who are, or appear to be, educated at home**

How to determine if EHE is suitable with no effective definition in place and with no 'right' to visit the home this is difficult to enact s436A of Education Act 1996. Parents can too easily prevent LA staff seeing the child and their education on a routine basis. This needs to be reviewed and changed and be replaced by a more appropriate alternative.

Local authorities have no statutory duties in relation to monitoring the quality of home education. LA's cannot be aware of poor or limited education provision if they cannot visit the child at home making s437(1) is almost worthless.

As stated 'Parents are under no duty to respond to such enquiries, but it would be sensible for them to do so'. LBB would like this strengthened to include a duty to respond in an appropriate manner and time frame.

### **34. Comments on Section 6: What should local authorities do when it is not clear that home education is suitable?**

1. Suitable needs defining as each LA has a differing view.
2. Swifter use of School Attendance Orders.

The draft guidance does give much needed clarity around SAO's.

We would suggest that every LA has an appointed EHE officer with QTS or equivalent qualification to enable final judgement on a case where the LA decision regarding the suitability of education is challenged by a parent.

It is considered that without legislation around registration and a requirement on the LA to visit and make a judgement based on the suitability of an education then it cannot ensure children satisfy their right to education. Also, evidence of progress should be clarified during a visit; this should not be reliant on paperwork but direct observation/looking at work completed by the child in question. Access to the child is very helpful in identifying if they are in receipt of appropriate education...seeing the child/young person is not necessarily about safeguarding, but does provide an opportunity for an adult to meet the child and thereby be in a position to raise concerns with other agencies if it appears they may be ill-treated.

### **35. Comments on Section 7: Safeguarding: the interface with home education**

LAs have general duties to safeguard but have no right to see the child if home educated.... This seems a contradiction. Yet s53 Children Act 2004 says that if reasonably practical to take account of children's wishes, but if you cannot even see the child if home educated, how can this take place?

### **36. Comments on Section 8: Home-educated children with special educational needs (SEN)**

8.1. Parental right to home educate...but for a child with an EHC Plan only in so far as it has been established that the parent can make and/or arrange the special educational provision in the EHC Plan.

8.3. Where a parent has elected to Home Educate their child, the likelihood of the Local Authority being able to identify that they have SEN is severely hampered and most usually only comes to light if the parent request EHC assessment

8.4. The local authority would only deem Elective Home Education suitable if the parent can make the special educational provision set out in an EHC Plan. The concern here is where parents wish to make Elective Home Education arrangements but is unable to make the special educational provision in the EHC Plan. Where parents are given the absolute right to have that arrangement regardless of their capacity to make the said provision, and Local Authorities were compelled to financially support parents in ensuring the provision, that the DSG would be destabilised to such an extent that the Local Authority could not make suitable education arrangements for all of the children and young people it is responsible for.

8.5. These instances are most common and suitable where the child or young person has complex and co-morbid education, health and care needs at a severe level or life-limiting conditions. These arrangements are often more or most effectively made through a Personal Budget arrangement. Hampshire County Council is clear about the distinction made in the paragraph, and has a number of examples where this arrangement is made appropriately.

8.6. Local authorities must retain the element of consent. Parents, though well-intentioned, may underestimate the expertise needed to meet the educational entitlement of a child/young person with SEND and local authorities must not be forced into a position of having to agree to the type of Home Education arrangements described in 8.5 where it agrees and arranges special education in the home, because of a parents' desire, regardless of their capacity, to have a home education arrangement. It is a local authority's duty to determine suitable education arrangements for a child/young person with an EHC Plan, not parents.

8.7. It is wholly insufficient to compel a Local Authority to meet its statutory duties including in safeguarding a child's well-being and entitlement to education – for some of the most vulnerable children and young people – through an arrangement where parents are merely “encouraged to see a process of engagement with the child as part of the authority's overall approach to home education of pupil with SEN...”. We disagree strongly with the statement “Local authorities should not assume that because the provision being made by parents is different from that which was being made or would have been made in school that the provision is necessarily unsuitable.” Special Educational Provision in section F of an EHC Plan is determined by an evidence-based and statutory investigation into a child or young person's special educational needs. This is appealable in the First Tier Tribunal, SEND. There cannot be a system where schools and qualified teachers and SENCOs – experts in educating children and young people – are compelled to make the special educational provision set out in an EHC Plan potentially under the order of a court, but that a parent with no educational qualification or expertise is permitted to essentially do-as-they-please. It remains a crucial determinant to Local Authorities that a parent's capacity and ability to ensure the delivery of special educational provision in an EHC Plan absolves it of its statutory duty to otherwise make the arrangements.

8.8. We disagree with the premise put forward in this paragraph, e.g. that “...a parents' commitment to Home Education (or other circumstances) makes it inappropriate for their child to attend school” then compels a Local Authority to agree to Home Education, whether that it is viewed as ‘Elective’ Home Education or where the Local Authority itself arranges it. Regardless of a parents belief in the notion of Home Education, the Local Authority retains responsibility to secure suitable education including special educational provision in-line with an EHC Plan, be that through Elective Home Education (unless the parent has demonstrated their arrangements to be suitable, in which case the LA is relieved of its duties), arranged Home Education or by attendance at an education institution. If, through investigation, it becomes apparent that the parent does not have the capacity or ability to make suitable education arrangements the local authority retains the responsibility. Furthermore, agreeing to Home Education arrangements cannot be on the basis that this causes an inefficient use of the public purse. The principles of section 19 of the Education Act 1996 come into play in determining the suitability of arranged Home Education arrangements, e.g. a defensible position being that these arrangements should not cost any more than they would were the local authority to arrange education in an institution. In reality, the default position for the majority of Local Authorities is that education will be offered and made through an offer of a suitable school placement, but it will, wherever possible and suitable, support families who wish to Home Educate their children. In some circumstances and in the most contentious cases where the Local Authority had a compelling view that the parents' preferred education arrangements are wholly unsuitable, through an education attendance order, but seeking such an order invariably raises further distrust from families towards LAs.

This paragraph (8.8) is in our view confusing and open to interpretation and could potentially conflict with the already published Guidance on Personal Budgets. The suggestion that a parent who has chosen to Electively Home Educate their child who has SEN can ask for funds from the High Needs Block for additional provision related to special educational needs potentially opens the flood gates and will lead to further conflict between parents and the LA.

It will be very difficult to quantify what is different and specifically related to SEN and there is potentially no redress for the LA to turn down requests. The majority of money from the High Needs Block is allocated to schools and commissioned services; however, where a choice has been made not to take up a school place and this has effectively been agreed, a suggestion that funding could be disaggregated on an individual basis and effectively condoned via national guidance is simply not sustainable.

### **37. Comments on Section 9: What do the s.7 requirements mean?**

Requirements are sound for parents to ensure education but how can s7 be assessed if the LA cannot meet with the family?

Section on 'Suitability' is generally helpful. However, It would be helpful for DfE to specify minimum requirements as to effectiveness in such matters as literacy and numeracy. It is a concern that, where parents decline to engage or receive a visit from the LA and are asked to give evidence of the education of their child/young person, they may provide written templates outlining the ethos of the education they are providing; which may not be an accurate account of what is actually being delivered to the child/young person. There is clear evidence that these are often downloaded from the internet in a generic form with spaces to 'insert child's name here' and are not bespoke to the individual learner nor ever intended to be applied.

### **38. Comments on Section 10: Further information**

Children's rights and views are rarely heard as, if they are unhappy there is little they can do to express their views without going through their parents. The LA staff is unlikely to develop deep and meaningful relationships through one or two visits a year, so this area is contentious.

It is noted that free DBS checks for parents are advocated - given that DBS checks are not 'free' and LA's are struggling in terms of finance this needs more thought and financing. In addition, a reasonable question might be why it would be considered appropriate for a 'Child In Need' or a child under a 'Child Protection Order', to be Home Educated, when this places the child/young person 24/7 in the care of the family, that is already raising concerns in relation to their ability to care for the child.

## **Draft revised DfE guidance on home education: for parents**

This section invites comments on different sections of the draft revised guidance document about the current framework for home education, which DfE proposes to publish for parents. Copies of the draft document can be downloaded from the Overview page.

### **39. Comments on Section 1: What is elective home education (EHE)?**

1.3 If a child is EHE they are not registered at a school. By discussing flexi schooling this confuses matters.

### **40. Comments on Section 2: What is the legal position of parents who wish to home educate children?**

This sets out the position clearly.

More 'definite' requirement on hours given to EHE although it might be helpful to suggest expectation that a minimum average of 3 to 5 hours per day.

2.11 clearly tells parents what they do not need to do but a similar table listing what is expected would be helpful as the existing text may give the impression to some parents that they need actually do very little.

2.13 - open to huge abuse...who might a child express their views to?

An emphasise that the parent has a legal duty to 'actually' educate their child if they opt to Home Educate and failure to do so would have legal consequences. It should leave the parent vulnerable to legal challenge in future years if the Child/young person considers they were denied an education during this time to which they are legally entitled.

#### **41. Comments on Section 3: So what do I need to think about before deciding to educate my child at home?**

3.2 Reasons are sound but would change 'distance to school' to preferred school place not available.

'Religious or cultural' has too much cross over with 'ideology or philosophy' - it would be hard to distinguish in practice. Suggest this list is given more thought as this would make a good basis for all LA's recording reasons and informing DFE of reasons for EHE.

3.7 - Some families chose EHE to have extended holidays, thus avoiding any Penalty Notices or other legal action. There needs to be comment that this is unacceptable and something in place to act as a deterrent.

#### **42. Comments on Section 4: If I choose to educate my child at home, what must I do before I start?**

4.2 - This is contrary to advice given, parents should inform school that they wish to EHE and school to take off roll/inform LA. By stating 'not obliged to inform school' this will make considerable extra work for schools/LA trying to find out where the child is. Some parents remove their child from school overnight without any chance to say goodbye – this may be damaging to the child.

4.3 - Any element of SEN needs to be explored whether special school or not.

4.5 - Some parents are very reluctant to admit EHE has not been a success; sadly many children miss out on a rounded education as a consequence. This may be because the parent is unable to put their child at the centre of the process. Some children are Home Educated to meet parental need, not child need. E.g. young single carers, or parents with their own mental health issues.

#### **43. Comments on Section 5: What are the responsibilities of your local authority?**

Safeguarding should include the right to speak with the child for their views.

5.7 - excellent

5.19 - Should it not come first in this section?

The minimum requirement of education to be stated should include reading, writing and numeracy. This would provide foundation guidance from which the parent can work when delivering the education they choose and the authority can have a base position when monitoring that a suitable education is taking place.

The guidance for parents provides a clear framework which better defines the roles and responsibility of both the parent and LA. It does not however refer to those children and young people who are known to be Home Educated and yet are under Child Protection Orders, these children should return to school until the LA are confident that the child/young person is no longer at risk and CP order can be lifted.

#### **44. Comments on Section 6: Further information**

Given the financial constraints on LA's checks must be paid from somewhere and if parents are taking responsibility then they should be asked for a contribution.

6.3 - Confuses the issue around flexi schooling. Please remove.

#### **Draft guidance documents: equality issues**

#### **45. Do you think that anything in the revised guidance documents could have a disproportionate impact, positive or negative, on those with 'relevant protected characteristics' (including disability, gender, race and religion or belief) - and if so, how?**

A minority of parents may use the legal status of EHE to mislead LA's and avoid educating their child. Children/young people who are carers or who are under child protection orders and those who are GRT and not in receipt of an education can be disadvantaged by being removed from the education system under the guise of EHE. A disproportion is in Year 10 and 11, and experience indicates this group are more likely to become NEET after compulsory education ends.

END